

May 9, 2017

To: Steve Lazar
From: Robie Tenorio

RE: Input regarding Scoping Meeting for Cannabis Environmental Impact Report

Despite the best intentions of the Humboldt County Planning & Building Department and the Humboldt County Board of Supervisors in passing the Humboldt County Code regulating cannabis activities on the ground impacts have been devastating in many of the categories covered in the Notice of Preparation.

Aesthetics – Since the ordinance’s passage the amount of plastic hoop greenhouses, solid metal or solid plastic fencing and other ugly and generally blight producing infrastructure has doubled or even tripled.

Agriculture and Forestry Resources – In Southern Humboldt since the passage of the ordinance the clear cutting of forest & use of timberland for grows has increased. By passing the ordinance without having sufficient enforcement in place to prevent this it has created a doubling or tripling of grows. To have people receive tax benefits under the Williamson Act does not appear to safeguard the need to preserve agricultural land for food production because of the high price paid for cannabis versus veggies or meat.

Air Quality – The increase traffic of large trucks constantly being driven on small dirt roads has greatly increased the amount of fugitive dust. How will you be able to measure the increase in pollution & degradation of air quality from the running of gas or diesel powered generators that are used for growing “mixed light”?

It is absolutely a mistake to allow and encourage any use of fossil fuels to grow a plant that could be grown without artificial light. The clear and present danger of Climate Change is not being addressed. When communities around the world are struggling to find ways to lessen their dependence on Fossil Fuels Humboldt County is encouraging an unnecessary contribution to Global Climate Disruption.

Biological Resources - I agree with every concern mentioned in this section. There is direct loss of vegetation and wildlife habitats due to the grading and vegetation removal for new cultivation & expansion of existing grows. There has been an increase in road construction, and an increase use of existing roads which all creates sediment, which will find its way into streams. The continued use of rivers, creeks, springs and seeps for these expansions will have a significant impact on wildlife both terrestrial and aquatic as watercourses dry up from diversion for cannabis growing. Noise pollution from generators, fencing and light emitted from “mixed light” cultivation all has a negative impact on wildlife and human neighbors. Again

because of the lack of enforcement there has been an increase of generator noise. Also it is a negative impact on the quality of life for residents of this previously quiet and peaceful rural area.

Cultural Resources and Tribal Cultural Resources –

How will you survey the areas for Tribal Cultural Resource concerns?
How will the County enforce any regulations concerning Tribal Cultural Resources?

The **Hazards & Hazardous Material** category should include the use of gas or diesel generators for indoor or “mixed light” grows. Where there is fuel used there will be spills – that will contaminate land and water ways.

The very serious impact of fires resulting from generator use for indoor or mixed light could be devastating for our area. In the unincorporated areas of the county we are dependent on our local volunteer fire departments, who have already had to respond to fires from generator grows. We have been lucky so far. But the potential for catastrophic wildfire is present and will put all of our communities at risk of losing their homes and possibly their lives. To continue to ask our volunteers to put their lives at risk for an indoor or mixed light cannabis grow is criminal.

Hydrology and Water Quality

Geology and Soils -

How will you be able to adequately assess the impacts on water and soil?
How will you be able to monitor the on the ground and in the waterway impacts of all these grows? Especially the ones not applying for permits but feeling that they can double and triple their grows because of a lack of enforcement.

Public Services

This may be the area to address impacts on roads. The roads in Southern Humboldt were built in a time of considerably less traffic. In the last 5 years traffic of large trucks, large trucks with trailers, 5, 10 & 20-ton delivery trucks and water trucks has greatly increased. Since the passing of the ordinance it has become a constant stream on all our roads.

Between the issues of 50 year old failing culverts (which is to be expected), very wet winters and the constant high impact of industrial level cannabis growing our county roads have been devastated. This also includes the same impacts on private sub division roads and has created problems for Road Associations who are not able to collect fees from those causing the damage.

In the Public Service category you do bring up the potential for increased risk of fire. This needs to be addressed – generators running in High Fire Hazard areas to grow cannabis indoors or mixed light puts all of us – but especially our volunteer fire fighters in serious danger.

Cumulative Impacts –

Because there is such a broad range of impacts from the air pollution to the disintegration of the roads it will be difficult if not impossible to fully assess the cumulative impacts.

But there is no doubt that industrial cannabis agriculture in remote rural areas of Humboldt County will have negative cumulative impacts on the air, the land, the waterways, the wildlife and the human population.

One area not mentioned is the use of plastic.

Californians have voted to eliminate single use plastic bags at the grocery stores yet the current cannabis farming practice for most growers uses an incredible amount of plastic. Plastic bags for fertilizer, plastic for greenhouses, plastic for the light dep grows. If you go to any of our local dumps you will see enormous piles of plastic. Much of it single use. This will have a long-term negative impact on the environment.